



CVCWA

Central Valley Clean Water Association

Representing Over Sixty Wastewater Agencies

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April 23, 2010

Submitted Via U.S. Mail and Electronic Mail

Bryan Smith
Regional Water Quality Control Board,
Central Valley Region
415 Knollcrest Drive, Suite 100
Redding, California 96002
bsmith@waterboards.ca.gov

**Re: Central Valley Clean Water Association's Comments on the Tentative Order
for the Shasta County Service Area No. 17—Cottonwood Wastewater
Treatment Plant**

Dear Mr. Smith:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit these comments on the tentative waste discharge requirements for the Shasta County Service Area No. 17—Cottonwood Wastewater Treatment Plant (Tentative Order). CVCWA is a non-profit organization of public agencies that own and operate wastewater treatment facilities throughout the Central Valley Region. CVCWA represents its members in regulatory matters that affect surface water discharge and land application with a perspective to balance environmental and economic interests consistent with applicable law. Accordingly, CVCWA takes interest in permit provisions adopted by the Central Valley Regional Water Quality Control Board (Regional Water Board).

CVCWA respectfully requests that you revise the Tentative Order's numeric monitoring trigger for chronic whole effluent toxicity to be consistent with the dilution credits being granted. The Tentative Order specifies a numeric toxicity monitoring trigger of "> 1 TUc (where TUc = 100/NOEC)." (Tentative Order at p. 22.) The monitoring trigger represents the toxicity threshold at which the treatment plant must begin accelerated monitoring and initiate a Toxicity Reduction Evaluation. (*Ibid.*) Therefore, it is important that the monitoring trigger be consistent with any dilution credit granted. The Tentative Order grants a dilution credit of 5.5 for aquatic life. (*Id.* at p. F-22.) The dilution credit is based on a complete mixing zone/dilution study, associated biological assessment and complete antidegradation analysis that shows the dilution credit satisfies State Water Resources Control Board Resolution No. 68-16. (*Id.* at pp. F-6, F-9.) The

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California Department of Fish and Game was consulted during the mixing zone/dilution study and biological evaluation. (*Id.* at p. F-6.) Accordingly, the Tentative Order's monitoring triggers should be "> 5.5 TUc (where TUc = 100/NOEC)."

Thank you for considering CVCWA's request that the toxicity monitoring trigger in the Tentative Order be revised to read: "> 5.5 TUc (where TUc = 100/NOEC)." Please contact me at (530) 268-1338 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Webster".

Debbie Webster
Executive Officer